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15 *Attorneys for Individual and Representative Plaintiffs*
16 *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier*
17 *Vazquez, Brandon Vera, and Kyle Kingsbury*

18 *(Additional counsel appear on signature page)*

19
20 **IN THE UNITED STATES DISTRICT COURT**
21 **FOR THE DISTRICT OF NEVADA**

22 Cung Le, Nathan Quarry, and Jon Fitch, Brandon
23 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
24 on behalf of themselves and all others similarly
25 situated,

26 Plaintiffs,

27 v.

28 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO
LODGE MATERIALS UNDER SEAL**

Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued in this action on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge certain documents under seal related to Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment.

Under Section 14.3 of the Protective Order, documents designated Confidential or Highly Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court, the Party claiming protection shall file a motion to seal setting forth the bases for sealing and proper authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some other applicable authority.” ECF No. 217 at 15.

The documents referenced below (or portions thereof) have been designated or refer to materials which have been designated Confidential or Highly Confidential – Attorneys’ Eyes Only by Defendant or third parties. Plaintiffs take no position at this time regarding whether these designations are merited and—pursuant to Section 6.1 of the Protective Order—reserve the right to challenge Zuffa’s or third parties’ confidentiality designations at any time. Accordingly, and solely on the basis of Zuffa’s and third parties’ confidentiality designations, Plaintiffs seek leave to lodge the following documents under seal.

First, Plaintiffs seek to lodge under seal Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment.

Second, Plaintiffs seek to lodge under seal Exhibit 1 to the September 21, 2018 Declaration of Eric L. Cramer, Esq. (the “Cramer Declaration”), which is a document entitled the Expert Report of Hal J. Singer, Ph.D., dated August 31, 2017.

Third, Plaintiffs seek to lodge under seal Exhibit 2 to the Cramer Declaration, which is a document entitled the Rebuttal Expert Report of Hal J. Singer, Ph.D., dated January 12, 2018.

Fourth, Plaintiffs seek to lodge under seal Exhibit 3 to the Cramer Declaration, which is a

1 document entitled the Supplemental Expert Report of Hal J. Singer, Ph.D., dated April 3, 2018.

2 Fifth, Plaintiffs seek to lodge under seal Exhibit 4 to the Cramer Declaration, which is a
3 document entitled the Second Supplemental Reply Report of Hal J. Singer, Ph.D., dated May 28, 2018.

4 Sixth, Plaintiffs seek to lodge under seal Exhibit 5 to the Cramer Declaration, which is a
5 document entitled the Expert Report of Andrew Zimbalist in *Cung Le, et al. v. Zuffa, LLC*, dated
6 August 31, 2017.

7 Seventh, Plaintiffs seek to lodge under seal Exhibit 6 to the Cramer Declaration, which is a
8 document entitled the Expert Rebuttal Report of Andrew Zimbalist, dated December 26, 2017.

9 Eighth, Plaintiffs seek to lodge under seal Exhibit 8 to the Cramer Declaration, which is a
10 document entitled the Expert Report of Guy A. Davis, CPA, CIRA, CDBV, CFE, dated August 31,
11 2017.

12 Ninth, Plaintiffs seek to lodge under seal Exhibit 9 to the Cramer Declaration, which contains
13 excerpts from a document entitled the Expert Report of Professor Robert H. Topel, dated October 27,
14 2017.

15 Tenth, Plaintiffs seek to lodge under seal Exhibit 10 to the Cramer Declaration, which contains
16 excerpts from a document entitled the Expert Report of Paul Oyer, dated October 27, 2017.

17 Eleventh, Plaintiffs seek to lodge under seal Exhibit 12 to the Cramer Declaration, which
18 contains excerpts from the first day of the 30(b)(6) deposition of Kirk D. Hendrick on behalf of Zuffa,
19 LLC, dated November 29, 2016.

20 Twelfth, Plaintiffs seek to lodge under seal Exhibit 13 to the Cramer Declaration, which
21 contains excerpts from the second day of the 30(b)(6) deposition of Kirk D. Hendrick on behalf of
22 Zuffa, LLC, dated November 30, 2016.

23 Thirteenth, Plaintiffs seek to lodge under seal Exhibit 14 to the Cramer Declaration, which
24 contains excerpts from the 30(b)(6) deposition of Ike Lawrence Epstein on behalf of Zuffa, LLC, dated
25 December 2, 2016.

26 Fourteenth, Plaintiffs seek to lodge under seal Exhibit 15 to the Cramer Declaration, which
27 contains excerpts from the deposition of Denitza Batchvarova, dated January 25, 2017.

1 Fifteenth, Plaintiffs seek to lodge under seal Exhibit 18 to the Cramer Declaration, which
2 contains excerpts from the deposition of Jon Fitch, dated February 15, 2017.

3 Sixteenth, Plaintiffs seek to lodge under seal Exhibit 20 to the Cramer Declaration, which
4 contains excerpts from the deposition of Kyle Kingsbury, dated February 17, 2017.

5 Seventeenth, Plaintiffs seek to lodge under seal Exhibit 21 to the Cramer Declaration, which
6 contains excerpts from the deposition of Jeremy Lappen, dated February 28, 2017.

7 Eighteenth, Plaintiffs seek to lodge under seal Exhibit 22 to the Cramer Declaration, which
8 contains excerpts from the deposition of Lorenzo J. Fertitta, dated March 23, 2017.

9 Nineteenth, Plaintiffs seek to lodge under seal Exhibit 23 to the Cramer Declaration, which
10 contains excerpts from the deposition of Shannon Knapp, dated April 11, 2017.

11 Twentieth, Plaintiffs seek to lodge under seal Exhibit 24 to the Cramer Declaration, which
12 contains excerpts from the deposition of Sean Shelby, dated April 12, 2017.

13 Twenty-first, Plaintiffs seek to lodge under seal Exhibit 25 to the Cramer Declaration, which
14 contains excerpts from the deposition of John Mulkey, dated April 19, 2017.

15 Twenty-second, Plaintiffs seek to lodge under seal Exhibit 26 to the Cramer Declaration, which
16 contains excerpts from the deposition of Jeffrey Aronson, dated April 25, 2017.

17 Twenty-third, Plaintiffs seek to lodge under seal Exhibit 27 to the Cramer Declaration, which
18 contains excerpts from the 30(b)(6) deposition of Drew Goldman on behalf of Deutsche Bank, dated
19 April 28, 2017.

20 Twenty-fourth, Plaintiffs seek to lodge under seal Exhibit 28 to the Cramer Declaration, which
21 contains excerpts from the deposition of Ike Lawrence Epstein, dated May 26, 2017.

22 Twenty-fifth, Plaintiffs seek to lodge under seal Exhibit 29 to the Cramer Declaration, which
23 contains excerpts from the deposition of Joseph Silva, dated June 7, 2017.

24 Twenty-sixth, Plaintiffs seek to lodge under seal Exhibit 30 to the Cramer Declaration, which
25 contains excerpts from the deposition of Scott Coker, dated August 3, 2017.

26 Twenty-seventh, Plaintiffs seek to lodge under seal Exhibit 31 to the Cramer Declaration, which
27 contains excerpts from Volume 1 of the first day of the deposition of Dana F. White, dated August 9,
28

1 2017.

2 Twenty-eighth, Plaintiffs seek to lodge under seal Exhibit 32 to the Cramer Declaration, which
3 contains excerpts from Volume 2 of the first day of the deposition of Dana F. White, dated August 9,
4 2017.

5 Twenty-ninth, Plaintiffs seek to lodge under seal Exhibit 33 to the Cramer Declaration, which
6 contains excerpts from the second day of the deposition of Dana F. White, dated August 10, 2017.

7 Thirtieth, Plaintiffs seek to lodge under seal Exhibit 34 to the Cramer Declaration, which
8 contains excerpts from the first deposition of Hal J. Singer, Ph.D., dated September 27, 2017.

9 Thirty-first, Plaintiffs seek to lodge under seal Exhibit 36 to the Cramer Declaration, which
10 contains excerpts from the first day of the deposition of Robert Topel, dated December 5, 2017.

11 Thirty-second, Plaintiffs seek to lodge under seal Exhibit 37 to the Cramer Declaration, which
12 contains excerpts from the second day of the deposition of Robert Topel, dated December 6, 2017.

13 Thirty-third, Plaintiffs seek to lodge under seal Exhibit 40 to the Cramer Declaration, which is a
14 document produced by Zuffa in this litigation with the Bates number ZFL-0827903.

15 Thirty-fourth, Plaintiffs seek to lodge under seal Exhibit 41 to the Cramer Declaration, which is
16 a document produced by Zuffa in this litigation with the Bates number ZFL-0872344.

17 Thirty-fifth, Plaintiffs seek to lodge under seal Exhibit 42 to the Cramer Declaration, which is a
18 document produced by Zuffa in this litigation with the Bates number ZFL-0872351.

19 Thirty-sixth, Plaintiffs seek to lodge under seal Exhibit 43 to the Cramer Declaration, which is a
20 document produced by Zuffa in this litigation with the Bates number ZFL-0990908.

21 Thirty-seventh, Plaintiffs seek to lodge under seal Exhibit 44 to the Cramer Declaration, which
22 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
23 1055607.

24 Thirty-eighth, Plaintiffs seek to lodge under seal Exhibit 45 to the Cramer Declaration, which is
25 a document produced by Zuffa in this litigation with the Bates number ZFL-1081154.

26 Thirty-ninth, Plaintiffs seek to lodge under seal Exhibit 46 to the Cramer Declaration, which is a
27 document produced by Zuffa in this litigation with the Bates number ZFL-1096310.

1 Fortieth, Plaintiffs seek to lodge under seal Exhibit 47 to the Cramer Declaration, which is a
2 document produced by Zuffa in this litigation with the Bates number ZFL-1240584.

3 Forty-first, Plaintiffs seek to lodge under seal Exhibit 48 to the Cramer Declaration, which
4 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
5 1384297.

6 Forty-second, Plaintiffs seek to lodge under seal Exhibit 49 to the Cramer Declaration, which is
7 a document produced by Zuffa in this litigation with the Bates number ZFL-1391183.

8 Forty-third, Plaintiffs seek to lodge under seal Exhibit 50 to the Cramer Declaration, which is a
9 document produced by Zuffa in this litigation with the Bates number ZFL-1404974.

10 Forty-fourth, Plaintiffs seek to lodge under seal Exhibit 51 to the Cramer Declaration, which is a
11 document produced by Zuffa in this litigation with the Bates number ZFL-1421551.

12 Forty-fifth, Plaintiffs seek to lodge under seal Exhibit 52 to the Cramer Declaration, which
13 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
14 1472158.

15 Forty-sixth, Plaintiffs seek to lodge under seal Exhibit 53 to the Cramer Declaration, which is a
16 document produced by Zuffa in this litigation with the Bates number ZFL-1484034.

17 Forty-seventh, Plaintiffs seek to lodge under seal Exhibit 54 to the Cramer Declaration, which is
18 a document produced by Zuffa in this litigation with the Bates number ZFL-1501599.

19 Forty-eighth, Plaintiffs seek to lodge under seal Exhibit 55 to the Cramer Declaration, which is
20 a document produced by Zuffa in this litigation with the Bates number ZFL-1872579.

21 Forty-ninth, Plaintiffs seek to lodge under seal Exhibit 56 to the Cramer Declaration, which is a
22 document produced by Zuffa in this litigation with the Bates number ZFL-1873428.

23 Fiftieth, Plaintiffs seek to lodge under seal Exhibit 57 to the Cramer Declaration, is a document
24 produced by Zuffa in this litigation with the Bates number ZFL-1874637.

25 Fifty-first, Plaintiffs seek to lodge under seal Exhibit 58 to the Cramer Declaration, which
26 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
27 1897652.

1 Fifty-second, Plaintiffs seek to lodge under seal Exhibit 59 to the Cramer Declaration, which is
2 a document produced by Zuffa in this litigation with the Bates number ZFL-1904802.

3 Fifty-third, Plaintiffs seek to lodge under seal Exhibit 60 to the Cramer Declaration, which is a
4 document produced by Zuffa in this litigation with the Bates number ZFL-1911498.

5 Fifty-fourth, Plaintiffs seek to lodge under seal Exhibit 61 to the Cramer Declaration, which is a
6 document produced by Zuffa in this litigation with the Bates number ZFL-2020850.

7 Fifty-fifth, Plaintiffs seek to lodge under seal Exhibit 62 to the Cramer Declaration, which is a
8 document produced by Zuffa in this litigation with the Bates number ZFL-2193553.

9 Fifty-sixth, Plaintiffs seek to lodge under seal Exhibit 63 to the Cramer Declaration, which
10 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
11 2277058.

12 Fifty-seventh, Plaintiffs seek to lodge under seal Exhibit 64 to the Cramer Declaration, which
13 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
14 2279086.

15 Fifty-eighth, Plaintiffs seek to lodge under seal Exhibit 65 to the Cramer Declaration, which is a
16 document produced by Zuffa in this litigation with the Bates number ZFL-2283306.

17 Fifty-ninth, Plaintiffs seek to lodge under seal Exhibit 66 to the Cramer Declaration, which is a
18 document produced by Zuffa in this litigation with the Bates number ZFL-2461790.

19 Sixtieth, Plaintiffs seek to lodge under seal Exhibit 67 to the Cramer Declaration, which
20 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
21 2463304.

22 Sixty-first, Plaintiffs seek to lodge under seal Exhibit 68 to the Cramer Declaration, which is a
23 document produced by Zuffa in this litigation with the Bates number ZFL-2469204.

24 Sixty-second, Plaintiffs seek to lodge under seal Exhibit 69 to the Cramer Declaration, which is a
25 document produced by Zuffa in this litigation with the Bates number ZFL-2469208.

26 Sixty-third, Plaintiffs seek to lodge under seal Exhibit 70 to the Cramer Declaration, which is a
27 document produced by Zuffa in this litigation with the Bates number ZFL-2477398.

1 Sixty-fourth, Plaintiffs seek to lodge under seal Exhibit 71 to the Cramer Declaration, which is a
2 document produced by Zuffa in this litigation with the Bates number ZFL-2496215.

3 Sixty-fifth, Plaintiffs seek to lodge under seal Exhibit 72 to the Cramer Declaration, which is a
4 document produced by Zuffa in this litigation with the Bates number ZFL-2497585.

5 Sixty-sixth, Plaintiffs seek to lodge under seal Exhibit 73 to the Cramer Declaration, which is a
6 document produced by Zuffa in this litigation with the Bates number ZFL-2528642.

7 Sixty-seventh, Plaintiffs seek to lodge under seal Exhibit 74 to the Cramer Declaration, which is a
8 document produced by Zuffa in this litigation with the Bates number ZFL-2528842.

9 Sixty-eighth, Plaintiffs seek to lodge under seal Exhibit 75 to the Cramer Declaration, which is a
10 document produced by Zuffa in this litigation with the Bates number ZFL-2535654.

11 Sixty-ninth, Plaintiffs seek to lodge under seal Exhibit 76 to the Cramer Declaration, which is a
12 document produced by Zuffa in this litigation with the Bates number ZFL-2536695.

13 Seventieth, Plaintiffs seek to lodge under seal Exhibit 77 to the Cramer Declaration, which is a
14 document produced by Zuffa in this litigation with the Bates number ZFL-2544572.

15 Seventy-first, Plaintiffs seek to lodge under seal Exhibit 78 to the Cramer Declaration, which
16 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZFL-
17 2700585.

18 Seventy-second, Plaintiffs seek to lodge under seal Exhibit 79 to the Cramer Declaration, which
19 is a document produced by Zuffa in this litigation with the Bates number ZFL-2757165.

20 Seventy-third, Plaintiffs seek to lodge under seal Exhibit 80 to the Cramer Declaration, which is
21 a document produced by Zuffa in this litigation with the Bates number ZFL-2764805.

22 Seventy-fourth, Plaintiffs seek to lodge under seal Exhibit 81 to the Cramer Declaration, which
23 is a document produced by Zuffa in this litigation with the Bates number ZFL-12535916.

24 Seventy-fifth, Plaintiffs seek to lodge under seal Exhibit 82 to the Cramer Declaration, which is
25 a document produced by Zuffa in this litigation with the Bates number ZFL-12543287.

26 Seventy-sixth, Plaintiffs seek to lodge under seal Exhibit 83 to the Cramer Declaration, which is
27 a document produced by Zuffa in this litigation with the Bates number ZUF-00031544.

1 Seventy-seventh, Plaintiffs seek to lodge under seal Exhibit 84 to the Cramer Declaration,
2 which is a document produced by Zuffa in this litigation with the Bates number ZUF-00085896.

3 Seventy-eighth, Plaintiffs seek to lodge under seal Exhibit 85 to the Cramer Declaration, which
4 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZUF-
5 00108798.

6 Seventy-ninth, Plaintiffs seek to lodge under seal Exhibit 86 to the Cramer Declaration, which
7 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZUF-
8 00111415.

9 Eightieth, Plaintiffs seek to lodge under seal Exhibit 87 to the Cramer Declaration, which is a
10 document produced by Zuffa in this litigation with the Bates number ZUF-00154095.

11 Eighty-first, Plaintiffs seek to lodge under seal Exhibit 88 to the Cramer Declaration, which
12 contains excerpts from a document produced by Zuffa in this litigation with the Bates number ZUF-
13 00162329.

14 Eighty-second, Plaintiffs seek to lodge under seal Exhibit 89 to the Cramer Declaration, which
15 is a document produced by Zuffa in this litigation with the Bates number ZUF-00284193.

16 Eighty-third, Plaintiffs seek to lodge under seal Exhibit 90 to the Cramer Declaration, which is a
17 document produced by Zuffa in this litigation with the Bates number ZUF-00296965.

18 Eighty-fourth, Plaintiffs seek to lodge under seal Exhibit 91 to the Cramer Declaration, which is
19 a document produced by Zuffa in this litigation with the Bates number ZUF-00325418.

20 Eighty-fifth, Plaintiffs seek to lodge under seal Exhibit 92 to the Cramer Declaration, which is a
21 document produced by Zuffa in this litigation with the Bates number ZUF-00336384.

22 Eighty-sixth, Plaintiffs seek to lodge under seal Exhibit 93 to the Cramer Declaration, which is a
23 document produced by Zuffa in this litigation with the Bates number ZUF-00395941.

24 Eighty-seventh, Plaintiffs seek to lodge under seal Exhibit 94 to the Cramer Declaration, which
25 is a document produced by Zuffa in this litigation with the Bates number ZFL-00395952.

26 Eighty-eighth, Plaintiffs seek to lodge under seal Exhibit 95 to the Cramer Declaration, which
27 contains excerpts from a document produced by The Carlyle Group in this litigation with the Bates

1 number CG-UFC-00000005.

2 Eighty-ninth, Plaintiffs seek to lodge under seal Exhibit 96 to the Cramer Declaration, which
3 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
4 the Bates number DB-ZUFFA-00006237.

5 Ninetieth, Plaintiffs seek to lodge under seal Exhibit 97 to the Cramer Declaration, which
6 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
7 the Bates number DB-ZUFFA-00006389.

8 Ninety-first, Plaintiffs seek to lodge under seal Exhibit 98 to the Cramer Declaration, which
9 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
10 the Bates number DB-ZUFFA-00006528.

11 Ninety-second, Plaintiffs seek to lodge under seal Exhibit 99 to the Cramer Declaration, which
12 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
13 the Bates number DB-ZUFFA-00006631.

14 Ninety-third, Plaintiffs seek to lodge under seal Exhibit 100 to the Cramer Declaration, which
15 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
16 the Bates number DB-ZUFFA-00006712.

17 Ninety-fourth, Plaintiffs seek to lodge under seal Exhibit 101 to the Cramer Declaration, which
18 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
19 the Bates number DB-ZUFFA-00014046.

20 Ninety-fifth, Plaintiffs seek to lodge under seal Exhibit 102 to the Cramer Declaration, which is
21 a document produced by Deutsche Bank Securities, Inc. in this litigation with the Bates number DB-
22 ZUFFA-00020303.

23 Ninety-sixth, Plaintiffs seek to lodge under seal Exhibit 103 to the Cramer Declaration, which
24 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
25 the Bates number DB-ZUFFA-00024678.

26 Ninety-seventh, Plaintiffs seek to lodge under seal Exhibit 104 to the Cramer Declaration,
27 which contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation

1 with the Bates number DB-ZUFFA-00056900.

2 Ninety-eighth, Plaintiffs seek to lodge under seal Exhibit 105 to the Cramer Declaration, which
3 contains excerpts from a document produced by Deutsche Bank Securities, Inc. in this litigation with
4 the Bates number DB-ZUFFA-00057908.

5 Ninety-ninth, Plaintiffs seek to lodge under seal Exhibit 106 to the Cramer Declaration, which is
6 a document produced by Moody's Investors Service, Inc. in this litigation with the Bates number
7 MDYS ZFF 000005.

8 One-hundredth, Plaintiffs seek to lodge under seal Exhibit 107 to the Cramer Declaration, which
9 is a document produced by Moody's Investors Service, Inc. in this litigation with the Bates number
10 MDYS ZFF 000039.

11 One-hundred-first, Plaintiffs seek to lodge under seal Exhibit 108 to the Cramer Declaration,
12 which is a document produced by Moody's Investors Service, Inc. in this litigation with the Bates
13 number MDYS ZFF 000058.

14 One-hundred-second, Plaintiffs seek to lodge under seal Exhibit 109 to the Cramer Declaration,
15 which is a document produced by Moody's Investors Service, Inc. in this litigation with the Bates
16 number MDYS ZFF 000074.

17 One-hundred-third, Plaintiffs seek to lodge under seal Exhibit 110 to the Cramer Declaration,
18 which is a document produced by Moody's Investors Service, Inc. in this litigation with the Bates
19 number MDYS ZFF 000082.

20 One-hundred-fourth, Plaintiffs seek to lodge under seal Exhibit 111 to the Cramer Declaration,
21 which contains excerpts from a document produced by Moody's Investors Service, Inc. in this litigation
22 with the Bates number MDYS 000103.

23 One-hundred-fifth, Plaintiffs seek to lodge under seal Exhibit 112 to the Cramer Declaration,
24 which contains excerpts from a document produced by The Raine Group, LLC in this litigation with the
25 Bates number RAIN0000019.

26 One-hundred-sixth, Plaintiffs seek to lodge under seal Exhibit 113 to the Cramer Declaration,
27 which contains excerpts from a document produced by The Raine Group, LLC in this litigation with the
28

1 Bates number RAIN0018791.

2 One-hundred-seventh, Plaintiffs seek to lodge under seal Exhibit 114 to the Cramer Declaration,
3 which contains excerpts from a document produced by The Raine Group, LLC in this litigation with the
4 Bates number RAIN0020542.

5 One-hundred-eighth, Plaintiffs seek to lodge under seal Exhibit 115 to the Cramer Declaration,
6 which contains excerpts from a document produced by The Raine Group, LLC in this litigation with the
7 Bates number RAIN0020633.

8 One-hundred-ninth, Plaintiffs seek to lodge under seal Exhibit 116 to the Cramer Declaration,
9 which contains excerpts from a document produced by WME-IMG in this litigation with the Bates
10 number WME_ZUFFA_00001150.

11 One-hundred-tenth, Plaintiffs seek to lodge under seal Exhibit 117 to the Cramer Declaration,
12 which contains excerpts from a document produced by WME-IMG in this litigation with the Bates
13 number WME_ZUFFA_00005368.

14 One-hundred-eleventh, Plaintiffs seek to lodge under seal Exhibit 118 to the Cramer
15 Declaration, which is a document produced by WME-IMG in this litigation with the Bates number
16 WME_ZUFFA_00013978.

17 One-hundred-twelfth, Plaintiffs seek to lodge under seal Exhibit 119 to the Cramer Declaration,
18 which is a document produced by WME-IMG in this litigation with the Bates number
19 WME_ZUFFA_00031950.

20 One-hundred-thirteenth, Plaintiffs seek to lodge under seal Exhibit 120 to the Cramer
21 Declaration, which contains excerpts from a document produced by Zinkin Entertainment & Sports
22 Management in this litigation with the Bates number Z.E._006755.

23 One-hundred-fourteenth, Plaintiffs seek to lodge under seal Exhibit 122 to the Cramer
24 Declaration, which contains excerpts from Exhibit 2 from the 30(b)(6) deposition of Kirk D. Hendrick,
25 taken in this matter on November 29-30, 2016.

26 One-hundred-fifteenth, Plaintiffs seek to lodge under seal Exhibit 123 to the Cramer
27 Declaration, which contains Exhibit 24 from the 30(b)(6) deposition of Kirk D. Hendrick, taken in this
28

1 matter on November 29-30, 2016.

2 One-hundred-sixteenth, Plaintiffs seek to lodge under seal Exhibit 124 to the Cramer
3 Declaration, which contains Exhibit 8 from the deposition of Joseph Silva, taken in this matter on June
4 7, 2017.

5 One-hundred-seventeenth, Plaintiffs seek to lodge under seal Exhibit 125 to the Cramer
6 Declaration, which contains Exhibit 11 from the deposition of Joseph Silva, taken in this matter on June
7 7, 2017.

8 One-hundred-eighteenth, Plaintiffs seek to lodge under seal Exhibit 126 to the Cramer
9 Declaration, which contains Exhibit 12 from the deposition of Joseph Silva, taken in this matter on
10 June 7, 2017.

11 One-hundred-nineteenth, Plaintiffs seek to lodge under seal Exhibit 127 to the Cramer
12 Declaration, which contains Exhibit 14 from the deposition of Joseph Silva, taken in this matter on
13 June 7, 2017.

14 One-hundred-twentieth, Plaintiffs seek to lodge under seal Exhibit 128 to the Cramer
15 Declaration, which contains excerpts from Exhibit 16 from the deposition of Joseph Silva, taken in this
16 matter on June 7, 2017.

17 One-hundred-twenty-first, Plaintiffs seek to lodge under seal Exhibit 129 to the Cramer
18 Declaration, which contains Exhibit 26 from the deposition of Joseph Silva, taken in this matter on
19 June 7, 2017.

20 One-hundred-twenty-second, Plaintiffs seek to lodge under seal Exhibit 130 to the Cramer
21 Declaration, which contains Exhibit 28 from the deposition of Joseph Silva, taken in this matter on
22 June 7, 2017.

23 One-hundred-twenty-third, Plaintiffs seek to lodge under seal Exhibit 131 to the Cramer
24 Declaration, which contains Exhibit 29 from the deposition of Joseph Silva, taken in this matter on
25 June 7, 2017.

26 One-hundred-twenty-fourth, Plaintiffs seek to lodge under seal Exhibit 132 to the Cramer
27 Declaration, which contains Exhibit 39 from the deposition of Joseph Silva, taken in this matter on
28

1 June 7, 2017.

2 One-hundred-twenty-fifth, Plaintiffs seek to lodge under seal Exhibit 133 to the Cramer
3 Declaration, which contains Exhibit 45 from the deposition of Joseph Silva, taken in this matter on
4 June 7, 2017.

5 One-hundred-twenty-sixth, Plaintiffs seek to lodge under seal Exhibit 134 to the Cramer
6 Declaration, which contains excerpts from Exhibit 3 from the 30(b)(6) deposition of Jeff Quinn, taken
7 in this matter on July 27, 2017.

8 One-hundred-twenty-seventh, Plaintiffs seek to lodge under seal Exhibit 137 to the Cramer
9 Declaration, which contains excerpts from Exhibit 117 from the deposition of Dana F. White, taken in
10 this matter on August 9-10, 2017.

11 One-hundred-twenty-eighth, Plaintiffs seek to lodge under seal Exhibit 138 to the Cramer
12 Declaration, which contains excerpts from Defendant Zuffa, LLC's Responses to Plaintiffs' Second,
13 Third, and Fourth Set of Requests for Admission, dated May 8, 2017.

14
15 Plaintiffs have filed all of these documents under seal, in accordance with the Court's ECF
16 system, with the instant motion. Plaintiffs have publicly filed placeholders for or redacted versions of
17 these documents with the Court, and will serve un-redacted versions of these documents on Defendant,
18 in accordance with LR IC 4-1(c)(4).

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1 Dated: September 21, 2018

Respectfully Submitted,

2 By: /s/ Eric L. Cramer
3 Eric L. Cramer

4 Eric L. Cramer (*Pro Hac Vice*)
5 Michael Dell'Angelo (*Pro Hac Vice*)
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Co-Lead Counsel for the Classes

1 **Liaison Counsel for the Classes**

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3 Bradley S. Schrager (Nevada Bar No. 10217)
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5 RABKIN, LLP
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7 Las Vegas, Nevada 89120
Phone: (702) 341-5200/Fax (702) 341-5300
dspringmeyer@wrslawyers.com
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8 **Additional Counsel for the Classes:**

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 21st day of September, 2018 a true and correct copy of the
3 **Plaintiffs' Motion for Leave to Lodge Materials Under Seal** was served via the United States District
4 Court CM/ECF system on all parties or persons requiring notice.

5 */s/ Eric L. Cramer* _____

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